

**Hearing Date and Time: April 23, 2009 at 10:00 a.m. (prevailing Eastern time)**  
**Objection Deadline: April 16, 2009 at 4:00 p.m. (prevailing Eastern time)**

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	)	
	)	
<b>DELPHI CORPORATION, <i>et al.</i>,</b>	)	<b>Chapter 11</b>
	)	<b>Case No. 05-44481(rdd)</b>
<b>Debtors.</b>	)	<b>(Jointly Administered)</b>
	)	

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on April 3, 2009, CSX Transportation, Inc. (“CSX”) and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), filed a Motion to Compel the Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A) (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on April 23, 2009 at 10:00 a.m. (prevailing Eastern time) (the “Hearing”) before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P.2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative Procedures, entered by this Court on March 20, 2006 (Docket No. 2883)

(the “Supplemental Case Management Order”), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att’n: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att’n: John Wm. Butler, Jr.), (iii) counsel to JPMorgan Chase Bank N.A., Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Att’n: Donald Bernstein and Brian Resnick), (iv) counsel for the official committee of unsecured creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att’n: Robert J. Rosenberg and Mark A. Broude), (v) counsel for the official committee of equity security holders, Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza, New York, New York 10004 (Att’n: Bonnie Steingart), (vi) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att’n: Brian Masumoto), in each case so as to be **received** no later than **4:00 p.m. (prevailing Eastern time) on April 16, 2009.**

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Supplemental Case Management Order will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are

timely filed and served in accordance with the procedures set forth herein and in the  
Supplement Case Management Order, the Bankruptcy Court may enter an order granting  
the Motion without further notice.

Date: April 3, 2009

Respectfully submitted,

/s/ John H. Maddock  
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